

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

CLAUDE DAVID CONVISSER, et al.)	
)	
<i>Plaintiffs,</i>)	
v.)	Case No. 3:24-cv-00072
)	
EXXON MOBIL CORP., et al.,)	
)	
<i>Defendants.</i>)	

MEMORANDUM IN OPPOSITION TO PLAINTIFF’S MOTION TO VACATE
SANCTIONS ORDER, and ASSOCIATED PARTIAL APPEAL OF SAID ORDER

Plaintiff /plaintiff’s counsel Claude Convisser objects to having been required to certify his having read the Federal Rules of Civil Procedure and the local rules of this Court. He so objects notwithstanding his own repeated admission that his lack of familiarity with said rules is what led to the professional improprieties giving rise to the sanctions order he challenges. Mr. Convisser’s motion to vacate the Court’s generously mild sanction manifests the very vexatious litigation giving rise to Glasberg’s motion for sanctions in the first place, and exemplifies the appropriateness of the sanction imposed. Glasberg respectfully submits that the motion to vacate also suggests the need for limited injunctive relief safeguarding the defendants – and the Court – from the regrettable and ongoing burdens of contending with plaintiffs’ excesses, *lest this never end*. For this reason, Glasberg respectfully asks the Court to require plaintiffs to secure competent attorney review and approval of further claims implicating (at least) Glasberg in relation to any claims bearing upon those at issue in this lawsuit, and to this extent, Glasberg appeals from the sanctions order which did not include this relief.¹

¹ Ironically, the sanctions order states, ECF 286 at 14: “Although a pre-filing injunction is not warranted at this time, Plaintiffs are cautioned that moving forward, the filing of similar unsupported and far-fetched claims and allegations may result in harsher sanctions.”

Respectfully submitted,

VICTOR M. GLASBERG,

By counsel

Dated: June 13, 2025

Counsel for Defendant Glasberg

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Certificate of Service

I, Victor M. Glasberg, hereby certify that on this 13th day of June 2025, I filed the above opposition memorandum and partial appeal from sanctions order with the clerk's ECF system.

//s// Victor M. Glasberg
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